



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

March 26, 2024

VIA ECF

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
40 Foley Square, Room 2103  
New York, New York 10007

**MEMO ENDORSED**

**Re: *Zafrin Hossain and Farhan Rahman v. U.S. Department of State, et al.*,  
No. 23 Civ. 8996 (KPF)**

Dear Judge Failla:

This Office represents the government in this action, in which plaintiffs seek an order compelling the U.S. Department of State to adjudicate plaintiff Rahman's immigrant visa application. I write respectfully to request a 30-day extension of the government's deadline to file a motion to dismiss, and corresponding 30-day extensions of the response and reply deadlines. The new proposed briefing schedule would be:

- The government's motion to dismiss due by April 29, 2024
- Plaintiffs' response due by May 30, 2024
- The government's reply due by June 13, 2024

This Office respectfully requests this extension because it needs additional time to confer with the State Department and to finalize its brief in support of the motion. This is the government's first request for an extension of its deadline to file its motion to dismiss, and plaintiffs consent to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/ Courtney E. Moran  
COURTNEY E. MORAN  
Special Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (917) 836-0126  
E-mail: courtney.moran@usdoj.gov  
*Attorney for Defendants*

cc: Counsel of record (via ECF)

Application GRANTED. The parties shall adhere to the briefing schedule as set out above.

The Clerk of Court is directed to terminate the pending motion at docket entry 20.

Dated: March 27, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE